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19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF BARRY
BAHRAMI IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF BARRY BAHRAMI

1. I, Barry Bahrami, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of San Diego County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have a valid and current California concealed carry weapon ("CCW") permit issued by the San Diego County Sheriff's Department and have carried for over twenty years.

5. I carry on a daily basis, so that I may be armed and be able to defend myself, and *far* more importantly, my children, in the event of a life-threatening emergency situation. Prior to SB 2, I only didn't carry my pistol when planning on going to one of the few places where carry was not legally permitted, such as a school or courthouse, or when I intended to have a drink with dinner.

6. In my 20 years with a CCW permit, I have carried concealed virtually everywhere it is legal to do so including sports events, public parks, public buildings, and on public transit. Not once has there ever been a single issue nor has my gun ever magically jumped out of the holster and started shooting anyone. It is my chosen method to keep myself and my family safe. I am trained and capable of using my concealed firearm to protect my family should it ever become necessary.

7. My son is 10 and my daughter is 9. I am a very active and involved father. It's a job I absolutely love. We go everywhere California has to offer. I do mean everywhere. My son is a massive train fan and he especially loves freight trains. And so we are often near the railroad to watch them go by, at all hours of the

1 day and (mostly) night. We are also often by the railyard to watch the freight trains
2 depart and arrive, which is in a fairly troubled part of town where crime happens
3 from time to time. We frequently ride the trains too, and I carry when we do so as
4 allowed by law. This includes weekend trips between Oceanside and San Clemente
5 on the Metrolink to get ice cream by the pier.

6 8. My daughter loves animals, so we are often at zoos, in and around Balboa
7 Park, the cliffs (a state park) and other areas you can probably imagine. Balboa
8 Park itself has crime issues, and so I'm sure to always carry there as well.

9 9. As the father of two children, you can imagine we are also at public parks
10 and playgrounds - a lot. The public park where my son likes to launch his model
11 rocket is next to a school. Children running around are the perfect soft target for
12 deranged and evil individuals. And as a licensed concealed carrier, I have always
13 been armed and ready to protect my children.

14 10. Both of my children also enjoy public libraries, and we visit both the local
15 Encinitas Library on Cornish Drive, as well as the San Diego Central Library when
16 we are downtown.

17 11. Now, California and our "leadership" under Governor Newsom want to
18 effectively take away my right to defend my children by turning nearly everywhere
19 into a so-called "sensitive place". Governor Newsom, of course, will not be giving
20 up armed security for *his* family or *his* children - "sensitive place" or not - but I am
21 to disarm even though no criminal will obey this foolish law.

22 12. Because SB 2 will prohibit me from carrying in many places where I am
23 accustomed to concealed carrying a firearm, the utility of my CCW permit, and thus
24 my right to be armed for self-defense in public, will be outright eliminated in nearly
25 all common contexts. I will be legislated out of my Constitutionally guaranteed
26 right to bear arms and put in a position where I must break the law to protect my
27 children in any meaningful way. The law will only serve to disarm me and make
28 my entire family defenseless at the crucial moment when we need our second

1 amendment right the most.

2 13. These are, of course, just a few examples of how SB 2 will affect me, and as
3 I go about my daily life, I am sure to discover several more. SB 2 will essentially
4 destroy my constitutional right to carry, as so few of the places I go to on a daily
5 basis will permit carry, and I don't want to expose my firearm to theft by constantly
6 leaving it in my vehicle. But for SB 2 and my fear of criminal prosecution, I would
7 continue to carry in all of these places as I did before the law took effect.

8 I declare under penalty of perjury that the foregoing is true and correct.
9 Executed on September 29, 2023.

10
11 *Barry Bahrami*

12 _____
13 Barry Bahrami
14 Declarant
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

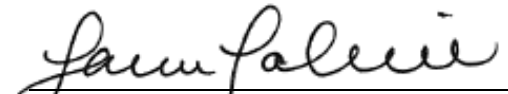
DECLARATION OF BARRY BAHRAMI IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.



Laura Palmerin